

# PAUL HASTINGS

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October 7, 2024

**VIA ECF**

Hon. Jennifer H. Rearden  
U.S. District Court, S.D.N.Y.

*Re: Rowe v. Google LLC*, Case No. 1:19-cv-08655-JHR

Dear Judge Rearden:

With this letter, Google LLC responds to Plaintiff Ulku Rowe's Notice of Supplemental Authority. (ECF No. 394.) Google did not contest the reasonableness of Outten & Golden LLP's hourly rates in its opposition to Plaintiffs' request for \$4.5 million in attorneys' fees despite her limited success at trial. (ECF No. 378 at 2 n.3 ("Solely for purposes of this motion, Google does not dispute that O+G's current hourly rates are reasonable.")) Plaintiffs' supplemental authority approving those hourly rates as reasonable is therefore irrelevant to the issues that remain before this Court. *Cf. Delgado v. Ocwen Loan Servicing, LLC*, No. 13-cv-4427, 2016 WL 4617159, at \*7 (E.D.N.Y. Sept. 2, 2016) ("the court will take note of those cases and consider them *to the extent they are relevant* to the [instant] motion") (emphasis added).

Plaintiff's purported supplemental authority is relevant only insofar as it addresses the separate issue of Outten & Golden's excessive and duplicative billing practices, both throughout litigation and in preparing post-trial motions. In *Perez v. Discover Bank*, No 20-cv-06896-SI, 2024 WL 4340397, at \*4 (N.D. Cal. Sept. 23, 2024), the court reduced Outten & Golden's fees by 20% due to concerns over "inefficiencies resulting in redundant and unnecessary billing" and "Class Counsel's request to bill 368.7 hours for preparing and litigating [the] fee request, especially given that counsel has presented similar fee requests before in analogous cases and should be familiar with the relevant legal landscape." (*Id.*) These are the same objections Google raised in opposition to Plaintiff's fee petition here, and the *Perez* decision supports Google's request to reduce Plaintiff's recovery of attorneys' fees on those bases. (See ECF Nos. 378 at 16–19 (detailing inefficiencies in Outten & Golden's billing practices); 386-1 (objecting to Plaintiff's request for over \$224,000 in fees, or 418 hours of attorney time, post-trial).)

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We thank the Court for its continued attention to this matter.

Respectfully submitted,

  
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